

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

**SEALED**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS HOLBERT aka "T,"  
LANCE HARPER,  
DALONTE FOARD, and  
GLENN WHITNEY aka "G" aka "G-Lo,"

Defendants.

8:20CR **333**

INDICTMENT  
18 U.S.C. § 1594(c)  
18 U.S.C. § 1591(a)

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
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The Grand Jury charges that

**COUNT I**

**(Conspiracy to Engage in Sex Trafficking of a Minor)**

1. Beginning on an unknown date, but from at least on or about November 2019, and continuing through on or about November 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendants, THOMAS HOLBERT aka "T," LANCE HARPER, DALONTE FOARD, and GLENN WHITNEY aka "G" aka "G-Lo" did unlawfully, willfully and knowingly conspire, combine, confederate and agree together and with each other, and with others known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain and maintain two minor females identified as MINOR VICTIM 1, and MINOR VICTIM 2, each name and date of birth fully known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1 and MINOR VICTIM 2, and knowing and in reckless disregard that MINOR VICTIM 1 and MINOR VICTIM 2 were each under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 and MINOR

VICTIM 2 would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a).

WAYS, MANNER, AND MEANS OF THE CONSPIRACY

2. The purpose of the conspiracy was to obtain money and other items of value for members of the conspiracy.

3. Members of the conspiracy would and did use MINORS to facilitate the conspiracy.

4. Members of the conspiracy recruited MINOR VICTIM 1, who was under the age of 18 years old, to be prostituted.

5. Members of the conspiracy would and did instruct the MINOR VICTIMs and young women how to advertise, solicit, and charge for commercial sex acts.

6. Members of the conspiracy obtained commercial sex customers for MINOR VICTIMs by purchasing and/or posting advertisements on internet sites such as [www.skipthegames.eu](http://www.skipthegames.eu) and [www.sipsap.com](http://www.sipsap.com). Sex customers responded to the advertisements via telephone and text message and commercial sex acts were coordinated to occur at various hotels, motels, and other locations.

7. Members of the conspiracy would and did use vehicles and public highways to drive the MINOR VICTIMs to various hotels, motels, and other locations for commercial sex acts, including Omaha, Nebraska and Norfolk, Nebraska.

8. Members of the conspiracy obtained and paid for various hotel and motel rooms for commercial sex acts involving the MINOR VICTIMs.

9. Members of the conspiracy would and did require the MINOR VICTIMs to pay a portion or all of the payments received for commercial sex acts to members of the conspiracy.

10. Members of the conspiracy did use firearms, violence, and the threat of violence

to scare and control the MINOR VICTIMS and young women being prostituted.

11. Members of the conspiracy did provide the MINOR VICTIMS with controlled substances to entice the MINOR VICTIMS and to control them.

In violation of Title 18, United States Code, Section 1594(c).

## **COUNT II**

### **(Sex Trafficking of a Minor)**

On or about September 24, 2020, through September 25, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, THOMAS HOLBERT aka "T", did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 1, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1 and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

## **COUNT III**

### **(Sex Trafficking of a Minor)**

On or about September 24, 2020, through September 25, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, THOMAS HOLBERT aka "T", did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 2, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 2 and knowing and in reckless disregard

that MINOR VICTIM 2 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

**COUNT IV**

**(Sex Trafficking of a Minor)**

On or about September 24, 2020, through September 25, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, DALONTE FOARD, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 1, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1 and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

**COUNT V**

**(Sex Trafficking of a Minor)**

On or about September 24, 2020, through September 25, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, DALONTE FOARD, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 2, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 2 and knowing and in reckless disregard that MINOR VICTIM 2 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

**COUNT VI**

**(Sex Trafficking of a Minor)**

On or about September 28, 2020, through September 29, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, LANCE HARPER, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 2, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 2 and knowing and in reckless disregard that MINOR VICTIM 2 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

**COUNT VII**

**(Sex Trafficking of a Minor)**

On or about September 21, 2020, through September 23, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, GLENN WHITNEY aka "G" aka "G-Lo," did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 2, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 2 and knowing and in reckless disregard that MINOR VICTIM 2 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

### FORFEITURE ALLEGATION

1. The allegations contained in Counts I through VII of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

2. Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendants, THOMAS HOLBERT aka "T," LANCE HARPER, DALONTE FOARD, and GLENN WHITNEY aka "G" aka "G-Lo," shall forfeit to the United States:

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and
- b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants THOMAS HOLBERT

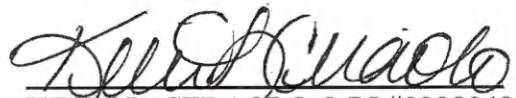
aka "T," LANCE HARPER, DALONTE FOARD, and GLENN WHITNEY aka "G" aka "G-Lo," up to the value of said property listed above as being subject to forfeiture.

Criminal forfeiture, in violation of Title 18, United States Code, Section 1594.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
KELLI L. CERAOLO, MN #0398049  
Assistant U.S. Attorney